

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ANTHONY C. WOODS,	:	
	:	
Plaintiff,	:	C.A. No. 05-812-SLR
	:	
v.	:	
	:	
SUE SCHAPPELLE and	:	
DR. ROBERTA BURNS,	:	
	:	
Defendants.	:	

**MOTION OF DEFENDANT, DR. ROBERTA BURNS, FOR AN EXTENSION
OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant, Dr. Roberta Burns, through our undersigned counsel, hereby moves this Honorable Court to enter the attached Order, granting her an extension of time until May 31, 2006 in which to respond to plaintiff's Complaint and, in support thereof, avers as follows:

1. Defendant, Dr. Roberta Burns, executed a Waiver of Service Form and her response to plaintiff's Complaint is due on or before May 1, 2006. D.I.#8.
2. Because of the allegations in Plaintiff's Complaint, counsel for defendant, Dr. Roberta Burns, requires additional time to obtain and review plaintiff's medical records in order to prepare an appropriate responsive pleading.

WHEREFORE, defendant, Dr. Roberta Burns, hereby respectfully moves this Honorable Court to enter the attached Order, granting her an extension of time until May 31, 2006 in which to respond to plaintiff's Complaint.

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN

BY: /s/ Kevin J. Connors

KEVIN J. CONNORS, ESQ.

DE Bar ID: 2135

1220 North Market Street, 5th Fl.

P.O. Box 8888

Wilmington, DE 19899-8888

Attorney for Defendant,

Dr. Roberta Burns

DATED: April 28, 2006

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CERTIFICATE OF SERVICE

I, Kevin J. Connors, hereby certify that two (2) copies of the **MOTION OF DEFENDANT, DR. ROBERTA BURNS, FOR AN EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**, have been served by E-File and Regular Mail to the following:

Anthony C. Woods
SBI #301308
SCI
PO Box 500
Georgetown, DE 19947

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN

BY: /s/ Kevin J. Connors
KEVIN J. CONNORS, ESQ.
DE Bar ID: 2135
1220 North Market Street, 5th Fl.
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Wilmington, DE 19899-8888
Attorney for Defendant,
Dr. Roberta Burns

DATED: April 28, 2006

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